

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

ALL TRACK ONE CASES

MDL No. 2804

Case No. 1:17-md- 2804

Hon. Dan Aaron Polster

**ENDO DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL AN
UNREDACTED VERSION OF ITS OPPOSITION TO MOTION TO DISQUALIFY**

Endo Pharmaceuticals Inc. and its affiliated companies (collectively “Endo”) hereby move for leave to file two versions of their response to the City of Cleveland, Cuyahoga County, the City of Akron and Summit County’s (“Plaintiffs”) now joint Motion to Disqualify. Specifically, Endo seeks permission to file a redacted copy of the brief and accompanying exhibits on the public docket and an unredacted copy of the brief and certain accompanying exhibits under seal.

This Court’s protective order provides:

Only Confidential or Highly Confidential portions of relevant documents are subject to sealing. To the extent that a brief, memorandum, or pleading references any document designated as Confidential or Highly Confidential, then the brief, memorandum or pleading shall refer the Court to the particular exhibit filed under seal without disclosing the contents of any confidential information. If, however, the confidential information must be intertwined with the text of the document, a party may timely move the Court for leave to file both a redacted version for the public docket and an unredacted version for sealing.

Dkt. # 441, ¶ 62.

Endo’s brief and certain exhibits contain references to portions of two depositions that

Motion granted. /s/Dan Aaron Polster 1/23/19